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December 9, 2011

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Special Access Rates for Price Cap Carriers;
WC Docket No. 05-25, RM-10593 - *Ex Parte* Notice

Dear Ms. Dortch:

On Wednesday, December 7, 2011, Leonard Steinberg of Alaska Communications Systems Group, Inc., on behalf of its operating subsidiaries (“ACS”) and I met with: Al Lewis, Betsy McIntyre, Andy Mulitz, Jenny Prime, Steve Rosenberg, and Deena Shetler of the Commission’s Wireline Competition Bureau. Amy Gardner of ACS joined by telephone conference. The subject of this meeting was the FCC’s pending inquiry into special access rates and pricing flexibility for price cap carriers in the above-captioned proceedings.

ACS described the highly competitive nature of the special access market in Alaska, and urged that the Commission not modify the pricing flexibility rules for price cap carriers in this market. ACS also discussed the services market, in which tariffed special access services typically are bundled with other services, both regulated and unregulated, complicating any price comparison purely for the special access component. Commission staff posed a number of specific questions about the nature and extent of facilities-based competition in the state. The FCC staff also asked whether the Commission’s various data requests are likely soliciting the best types of data to render a complete picture to the Commission of the Alaska special access market. ACS intends to respond to these questions at a later date.

Marlene H. Dortch
December 9, 2011

Please direct any questions regarding these matters to me.

Very truly yours,

/s/

Karen Brinkmann
Counsel to ACS

cc:	Zachary Katz	Betsy McIntyre
	Angela Kronenberg	Andy Mulitz
	Christine Kurth	Jenny Prime
	Sharon Gillett	Steve Rosenberg
	Al Lewis	Deena Shetler